

GVNW CONSULTING, INC.

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TEL 503.612.4400  
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November 1, 2005

**By Mail:**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**By Courier:**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Dear Ms. Dortch:

Please find enclosed an original and two (2) copies of the petition for an additional Section 107 (c) extension of CALEA Packet-Mode Communications capability requirements for InterBel Telephone Cooperative, Inc., TRS 803244.

Please return the stamped copy in the enclosed SASE. If there are any questions, I may be reached on 503-612-4400.

Sincerely,

John B. (Jack) Pendleton  
Consultant of Record for InterBel Telephone Cooperative, Inc.

Enclosure – Petition with attachment

**Copies to:**

CALEA Section 107(c) Petition  
Network Services Division  
Portals II, 445 12<sup>th</sup> Street, S.W., Room 6-A320  
Washington, D.C. 20554

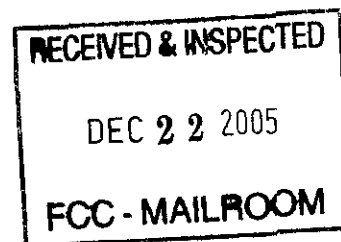
Michael Gordon  
InterBel Telephone Cooperative, Inc.  
PO Box 648  
Eureka, MT 59917

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No. of Copies rec'd  
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Before the  
Federal Communications Commission  
Washington, D.C. 20554



In the Matter of: )  
 )  
The Communications Assistance ) CC Docket No. 97-213  
For Law Enforcement Act (CALEA), ) InterBel Telephone Cooperative, Inc.  
Section 107(c) Extension of Capability ) TRS 803244  
Requirements )  
 ) Wireline Competition Bureau

PETITION FOR EXTENSION

1. InterBel Telephone Cooperative, Inc. (TRS 803244) ("InterBel") respectfully submits this supplement to InterBel's existing petition, pursuant to section 107(c) of the Communications Assistance for Law Enforcement Act (CALEA), for an additional extension of its November 19, 2005 deadline for compliance with certain of the capability assistance requirements imposed by section 103 of CALEA. In 2003, InterBel requested the FCC to grant an extension from November 19, 2003 to November 19, 2005.

2. InterBel is a wireline local exchange carrier whose service area is located in City, State and has approximately 760 access lines that serve business and residential customers in rural areas. InterBel qualifies as a "rural telephone company" under 47 U.S.C. § 153(37).

3. InterBel currently offers DSL broadband service to its customers. Per Section 106 (a) of the CALEA statute, InterBel has through its consultant contacted the manufacturers of its telecommunications equipment, and has found that the manufacturers of equipment deployed in InterBel's network are unable to certify that the equipment deployed in InterBel's network is compliant with the CALEA standard. Until such certification is made, InterBel believes it is appropriate to file for an extension of the CALEA capability requirements, as InterBel is unable to certify that it complies with the CALEA packet mode capability at this time. Until such time as the vendor can offer written confirmation that its equipment provides a CALEA solution, InterBel cannot at this time reasonably achieve compliance. InterBel requests an extension until November 19, 2007 to comply with CALEA's packet-mode capability requirements.

4. InterBel anticipates that, upon approval of an industry standard for deployment of CALEA packet mode functionality, the manufacturers of equipment in InterBel's network will make commercially available to InterBel functionality to comply with the CALEA Packet Mode requirement. Once equipment is commercially available, InterBel plans to deploy the CALEA Packet Mode functionality in its network as soon as economically feasible. Due to the national security nature of CALEA, Petitioner plans to work diligently to comply with the CALEA requirements.

5. Michael Gordon, InterBel Telephone Cooperative, Inc., 1300 Dewey Ave., PO Box 648, Eureka, MT 59917, phone: 406-889-3311, fax: 406-889-3787, is authorized to discuss CALEA-related matters with the Commission. Questions related to this may also be directed to Consultant name, GVNW Consulting, Inc., address, telephone number, facsimile number, email address.

6. This petition is signed below by an authorized agent of the petitioner, who is authorized by the carrier listed on the petition to verify the accuracy of the information provided to authorized representatives of the Federal Communications Commission.

A handwritten signature in black ink, appearing to read "John B. Pendleton", with a stylized flourish at the end.

John B. (Jack) Pendleton  
Consultant of Record for InterBel Telephone Cooperative, Inc.

**InterBel Telephone Cooperative, Inc. (TRS 803244)**

**Section 107 (c) Waiver**

**Attachment A**

a.) On May 2, 2005, GVNW Consulting, Inc. contacted Cisco Systems, the vendor of router equipment for InterBel regarding compliance of their products to the CALEA Packet Mode requirement. GVNW contacted Cisco a second time on May 10, 2005 regarding this issue. On May 12, 2005, Cisco declined to respond to GVNW's request. Thus GVNW, and InterBel are unable to certify that the equipment deployed in InterBel's network is compliant with the CALEA standard.

Attachment B is the Appx D

## ATTACHMENT B

OMB Control Number: 1110-0030  
Expiration date: April 30, 2007

Carrier Name **InterBel Telephone Cooperative, Inc.**  
 Filer 499 ID **803244**  
 Contact Person **Michael Gordon**  
 Address **PO Box 648**  
 City, State, Zip **Eureka, MT 59917**  
 Telephone Number **406-889-3311**  
 Fax Number **406-889-3787**  
 E-mail Address **mgordon@interbel.com**

If Applicable:

Consultant of Record (COR)  
 COR Company Name  
 COR Address  
 COR City, State, Zip  
 COR Telephone Number  
 COR Fax Number  
 COR E-mail Address

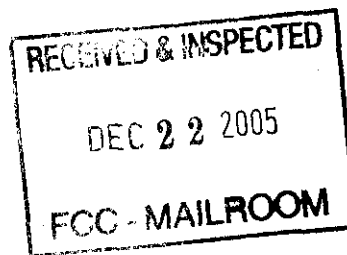
**John B. Pendleton**  
**GVNW Consulting, Inc.**  
**8050 SW Warm Springs, Ste 200**  
**Tualatin, OR 97062**  
**503-612-4400**  
**503-612-4401**  
**jpndleton@gvnw.com**

Component Specific Information					Deployed Generics										Interceptions			
					Previous -1		Previous		Current		Next		Next + 1					
					n-2		n-1		n		n+1		n+2					
CLI Code or Other Unique Identifier	Component Location		Service Area(s) Served	Manufacturer & Component Platform	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	2000	2001	2002	2003
	City	State (ST)																
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Cisco 53192					IOS 12.2	02/04					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Cisco 7206					IOS 12.1	03/03					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Conklin 2000					5.2.2	09/04					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Alcatel 1000						06/97					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Alcatel 7300						06/97					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Calix C7					C 7	05/05					0	0	0	0

Please e-mail this form to [FlexD@AskCALEA.net](mailto:FlexD@AskCALEA.net) (please include "Fourth Edition" in subject line)  
 or fax to (703) 814-4750 (please include "Fourth Edition" on cover sheet)

Prepared 12/16/05

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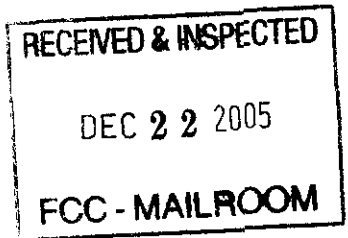
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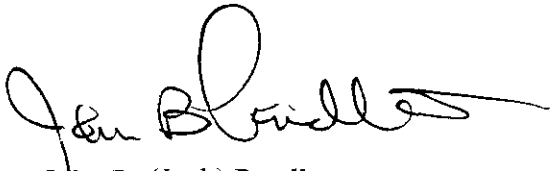
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John B. (Jack) Pendleton  
Consultant of Record for InterBel Telephone Cooperative, Inc.



**InterBel Telephone Cooperative, Inc. (TRS 803244)**

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 Filer 499 ID 803244  
 Contact Person Michael Gordon  
 Address PO Box 648  
 City, State, Zip Eureka, MT 59917  
 Telephone Number 406-889-3311  
 Fax Number 406-889-3787  
 E-mail Address mgordon@interbel.com

## If Applicable:

Consultant of Record (COR)  
 COR Company Name  
 COR Address  
 COR City, State, Zip  
 COR Telephone Number  
 COR Fax Number  
 COR E-mail Address

John B. Pendleton  
GVNW Consulting, Inc.  
8050 SW Warm Springs, Ste 200  
Tualatin, OR 97062  
503-612-4400  
503-612-4401  
jpendleton@gvnw.com

Component Specific Information					Deployed Generics										Interceptions			
					Previous -1		Previous		Current		Next		Next + 1					
					n-2		n-1		n		n+1		n+2					
CLLI Code or Other Unique Identifier	Component Location		Service Area(s) Served	Manufacturer & Component Platform	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	2000	2001	2002	2003
	City	State (ST)																
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Cisco 53192					IOS 12.2	02/04					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Cisco 7206					IOS 12.1	03/03					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Conklin 2000					5.2.2	09/04					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Alcatel 1000						06/97					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Alcatel 7300						06/97					0	0	0	0
ERKRMTXCDS1	Eureka	MT	Eureka Rural, MT	Calix C7					C 7	05/05					0	0	0	0

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